



**KNIGHT  
FIRST AMENDMENT  
INSTITUTE**

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November 7, 2019

**BY ECF**

The Honorable John G. Koeltl  
United States District Judge  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

**Re:   *Freedom of the Press Found., et al. v. Dep't of Justice, et al.*,  
No. 17 Civ. 9343 (JGK)**

Dear Judge Koeltl:

Pursuant to the Court's order filed October 18, 2019, ECF No. 40, I write respectfully on behalf of the parties in the above-referenced matter to provide a joint status report.

In their October 16, 2019 status report, ECF No. 39, the parties proposed that they file a status report proposing a briefing schedule by today, November 7, 2019. The parties have continued to engage in discussions about the scope of the challenges to be addressed in their upcoming motion practice, and Plaintiffs have provided the government with their list of challenges. The U.S. Department of Justice's Criminal Division has informed Plaintiffs that it needs additional time to consider its withholdings in light of Plaintiffs' challenges.

Given this, the parties respectfully propose that they file a further status report by **November 18, 2019**, in which they will propose a briefing schedule. The parties have previously requested two extensions of time to propose a briefing schedule, which the Court has granted.

Respectfully,

s/ Anna Diakun

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